

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

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IN THE
UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISIONJOHN F. CORCORAN, CLERK
BY: *R. Corcoran*
DEPUTY CLERK

UNITED STATES OF AMERICA)	INDICTMENT
)	
)	Criminal No. <u>7:08CR54</u>
v.)	
)	All in Violation of:
WILLIAM A. WHITE)	18 U.S.C. §875(b)
)	18 U.S.C. §875(c)
)	18 U.S.C. §1512(b)(1)

INTRODUCTION

The Grand Jury charges that:

1. At times relevant to this indictment, **WILLIAM A. WHITE** lived in Roanoke, Virginia, and held himself out to be the Commander of the American National Socialist Workers Party, identifying himself as Bill White, Commander, American National Socialist Workers Party ("ANSWP").

2. At times relevant to this indictment, **WILLIAM A. WHITE** administered and maintained a white supremacist website, "*Overthrow.com*," and controlled the posting, editing and removing of information on that website.

3. At times relevant to this indictment, **WILLIAM A. WHITE** posted information and communications on *Overthrow.com*, intending that his postings would be read by the *Overthrow.com* audience, which included persons who agreed with the white supremacist doctrine espoused on the website.

4. At times relevant to this indictment, **WILLIAM A. WHITE** posted information and communications on an Internet chat group, *nsmamerica@yahoogroups.com*, intending that his

postings would be read by the *nsmamerica@yahoo.com* audience, which included persons who agreed with the white supremacist doctrine espoused on the blog.

5. At times relevant to this indictment, **WILLIAM A. WHITE** posted information and communications on a white supremacist website, the *Vanguard News Network Forum*, intending that his postings would be read by the *Vanguard News Network Forum* audience, which included persons who agreed with the white supremacist doctrine espoused on the website.

6. At times relevant to this indictment, **WILLIAM A. WHITE** transmitted and received email communications using the following email addresses: *nationalsocialistworkers@yahoo.com*; *nsmroanoke@yahoo.com*; *answp@nazi.org*, and *dhyphen@yahoo.com*.

7. At times relevant to this indictment, **WILLIAM A. WHITE** posted Internet communications on the above referenced websites expressing his intent to influence others to commit violent acts against persons with whom **WILLIAM A. WHITE** disagreed. Pertinent examples include the following:

A. *[Name of EW, elderly Jewish scholar who had been attacked by a white supremacist redacted] should be afraid to walk out his front door but for the rightful vengeance of the white working people he and his Holocaust lies have exploited.*

* * * * *

"For decades, the Jews and the liars have used physical force, violent attacks on peaceful demonstrators and peaceful meetings, and the violent physical force of unjust and tyrannical laws to silence those who question the Holocaust lie. If white people-are going to undo this system, we have to be ready to adapt and use the tactics of our exploiters.

"Insofar as my views may have played a role in motivating Mr[sic] [name of man who attacked EW redacted], I can only say that I hope I inspire a hundred more young white people to sacrifice themselves for our collective racial whole. The only thing more noble than sacrifice is victory.

"Heil Hitler."

B. *For those who have not heard so much about our website, please realize that the American National Socialist Workers Party is not just a website but a real world organization. We do fun stuff like start riots and kidnap famous Jews.*

C. *Plus, [name of **RW** Canadian lawyer redacted] has now put the idea into the head of millions of Canadians that he should be killed – along with Canada's entire Jewish population. That's worth something to. [Sic.] At the very least, it encourages the least stable members of society, who had been held back because they felt isolated in their desires, to act. Its [sic] called the copycat effect – and I expect to see acts of resistance to the Canadian government become manifest in the near future.*

D. *Then, the Canadian Broadcasting Company called and said "Well, what if someone took [personal contact information for **RW** Canadian lawyer] and your anti-Jewish rhetoric and did something violent to him."*

And I replied, "I hope someone does something violent to him. He deserves to be killed.

E. *I really don't have anything against people who go on shooting sprees like this [in reference to a mass-murderer who selected his victims based on race]. I'm not encouraging anyone to do so – law and order and all being necessary – but our decadent society refuses to punish so many people that are deserving of justice, that a little bit of private justice, when properly directed, as in this case, is not a bad thing at all.*

F. *We have no intention of removing [from an Internet posting] Mr[sic] [name of **LP** African American journalist redacted] personal information .*

Frankly, if some loony took the info and killed him, I wouldn't shed a tear.

That also goes for your whole news room.

8. At times relevant to this indictment, **WILLIAM A. WHITE** posted items on the *Overthrow.com* website and other white supremacist forums with the intent to publicize his personal interest in carrying out violent acts. One example stated in pertinent part:

Things have become progressively worse, day by day, and I have woke [sic] up more and more often feeling the need to kill, kill, kill, and have tried to get through my day while ignoring the need to destroy the wicked.

Its not been easy.

* * * * *

Combined with this dead feeling I realized the other day that I have, almost without realizing it, though that may seem a bit strange, developed a very intricate plot for the murder of about a score of Roanoke City's Negro nuisances and their annoying counterparts at the [organization name redacted]. I know everything about these assholes - where they live, who they live with, what they look like, where they go, when they go there. I estimate I could probably, in the course of a few hours, kill fifteen out of the twenty easy if I picked the right day and time, and still lived long enough to travel the country and begin picking off the ridiculous "independent journalists" that staff the [organization name redacted] Report. I have a list of those as well.

9. On or about March 22, 2007, **JP**, an employee of Citibank in its Kansas City, Missouri offices, was assigned to handle a financial dispute involving **WILLIAM A. WHITE**'s Citibank account.

10. On or about March 21, 2007, **WILLIAM A. WHITE** made dozens of telephone calls to Citibank, attempting to identify **JP**. The next day, on or about March 22, 2007, **WILLIAM A. WHITE** made a telephone call to **JP**'s co-worker and insisted on speaking with **JP**, stating "you better make her available."

11. On or about March 22, 2007, **WILLIAM A. WHITE** called **JP**'s work telephone, leaving a voice mail, identifying himself and stating that he wanted to talk to **JP**. That evening, **WILLIAM A. WHITE** called **JP**'s home telephone, leaving a voice mail, identifying himself, stating that he wanted to talk to **JP**, and informing her that he had sent an email to her work.

12. On or about March 22, 2007, **WILLIAM A. WHITE** transmitted an email communication to **JP**'s Citibank email address, concluding with a weblink to information concerning

Judge **JL**. Judge **JL** was a judge in a case involving a white supremacist who was later convicted of soliciting the murder of Judge **JL**. In a highly publicized incident, Judge **JL**'s husband and mother were later brutally murdered in Judge **JL**'s home. **WILLIAM A. WHITE'S** email communication stated in pertinent part:

Ms [JP]

[name, age, address, and telephone number of JP and name, addresses and telephone numbers of her family members redacted]

** * * * **

In any case, if you could please fax my attorney [name redacted] the paperwork on the clearance of the derogatory information on my credit report within 24 hours, I would appreciate it. His fax number is [fax number redacted].

I understand you think you're very tough and you think that by dragging this process out you have created me a lot of misery; that is an incorrect assessment, but I must admit I have run out of patience with you and your smug attitude. I hope the fact that I've obviously paid someone to find you conveys the seriousness with which I take your current attitude.

If you resolve this issue quickly and efficiently I can guarantee you will not hear from me again; if you don't, well, you will be well known to the Citibank customers you are currently in litigation with in very short amount of time.

Again, make my life easy, fax over the letter, and you will not be hearing from me again.

Sincerely,

*Bill White, Managing Member
White Homes and Land LLC*

*PS: I took the liberty of buying the Citicard Credit Services, Inc corporate phone directory and locating information on your outstanding disputed credit accounts from an internet dealer today, and can probably make you better known to your customers than the security measures you enact at your company indicate you would like. Consider this, as I'm sure, being in the collections business and having the attitude about it that you do, that you often make people upset. Lord knows that drawing too much publicity and making people upset is what did in **JL**:*

*[weblink to information concerning Judge **JL** redacted]*

** * * * **

13. On or about March 23, 2007, **WILLIAM A. WHITE** posted an Internet communication on *Overthrow.com* that reported **WILLIAM A. WHITE**'s characterization of his email communication with **JP** on the previous day and stated in pertinent part:

***I Answer The Magic Question
What It Takes To Get Citigroup To Give You Good
Customer Service***

Commentary – Citicard, Citibank – I'm throwing all the Citis in here so this will properly be indexed by Google.

* * * * *

Folk may remember that a year and a half ago the CIT Group was forced to pay me a \$100,000 judgment for wrongful foreclosure. They reported me in foreclosure when I wasn't and wouldn't fix it, then didn't show up in court. 'Nuff said.

* * * * *

This week, I lost patience with it.

*There has been one girl at Citibank who is their head debt collector. She is in their Litigation Management division. * * * She likes abusing power. I hate people like that.*

* * * * *

It took me three hours to find that person, but find them I did.

* * * * *

It then took me two hours to figure out how to spell her last name, which is unusual. Once I did though, she was easy to find.

So I sent someone to her house last night to have a word with her. Specifically, she was told that she either [sic] did what I've been trying to get her to do and stop obstructing me or I was going to release her name, address, phone number, family members etc. onto the internet and let anonymous have a whack at Citigroup's head debt collector.

This morning the papers were pushed.

So there is the answer to the magic question of what exactly it takes to get Citigroup to give you good customer service – hunt their debt collectors down at home and show them what being tough with someone really means. Anything else, Citigroup just seems to blow off.

14. On or about May 18, 2007, African American tenants living in a Virginia Beach, Virginia housing complex elected to assert claims through the United States Department of Housing

and Urban Development alleging that their landlord was engaging in discriminatory practices. That legal action was subsequently reported in the media.

15. On or about May 23, 2007, **WILLIAM A. WHITE** caused to be mailed letters to the African American Virginia Beach, Virginia tenants described in Paragraph 14, supra. These letters displayed the letterhead of the National Socialist American Workers Party, a Nazi swastika, White's signature and title and stated in pertinent part:

*Whiny Section 8 Nigger
[addresses redacted]*

Re: Your complaint against [landlord's name redacted]

Dear Nigger Tenant:

I read today of your complaint against [name redacted]. I do not know [name redacted], but I do know your type of slum nigger, and I wanted you to know that your actions have not been missed by the white community.

For too long, niggers like you have been allowed to get one over on the white man. You won't work. You won't produce. You breed and eat and turn the world around you into a filthy hole, but you won't do anything to earn or deserve the life you live. Niggers like you are nothing new. All of Africa behaves as you do – with the difference that, there, there is no white man to exploit, only brutal nigger dictators to give the lot of you the kind of government you deserve.

You may get one over on your landlord this time, and you may not. But know that the white community has noticed you, and we know that you are and will never be anything other than a dirty parasite – and that our patience with you and the government that coddles you runs thin.

*Sincerely,
/s/*

*Bill White, Commander
American National Socialist Workers Party*

16. On or about May 25, 2007, the African American Virginia Beach, Virginia tenants each received **WILLIAM A. WHITE**'s May 23, 2007 letter in their Virginia Beach, Virginia home

mail boxes. These letters were delivered in envelopes bearing the name and address of each African America tenant recipient. Included in the envelope was an ANSWP magazine, emblazoned with a swastika and entitled, "The Negro Beast and Why Blacks Who Work Aren't Worth the Cost of Welfare." The magazine contains numerous articles espousing extreme white supremacist viewpoints.

17. On or about the morning of June 3, 2007, *The Miami Herald*, among other newspapers, published an opinion piece written by **LP**, an African American journalist who lived in Bowie, Maryland. In that opinion piece, **LP** expressed his views about the reaction of some of the public to a tragic and gruesome murder of a white couple by an African American gang in Knoxville, Tennessee.

18. On or about June 3, 2007, at or about 11 p.m., **WILLIAM A. WHITE** made a telephone call to **LP**'s personal telephone line at his Bowie, Maryland home, spoke with **LP**'s wife, identified himself as Bill White, the Commander of the American National Socialist Workers Party, and insisted on speaking with **LP**.

19. On or about June 3, 2007, at or about 11:15 p.m., **WILLIAM A. WHITE** transmitted an email communication to **LP**'s personal email address that was received by **LP**'s personal computer in Bowie, Maryland. The email communication stated in pertinent part:

Dear Mr. [LP's name redacted]:

In regard to your column on Knoxville

[website redacted]

*I can only suggest you follow the advice of
Screwdriver:*

Nigger nigger get on the boat

Nigger nigger row

*Nigger nigger get out here
Nigger nigger go*

*You and your fellow black filth are quickly losing
ground, and I look forward to the rapidly approaching
day when whites once again rise up and slaughter and
enslave your ugly race to the last man, woman and child.*

Itz coming.

*Bill White, Commander
American National Socialist Workers Party*

20. On or about June 3, 2007, at or about 11:34 p.m., **WILLIAM A. WHITE** transmitted an email communication to **LP**'s personal email address. The email communication contained the home address and telephone number for **LP**'s family, referenced the telephone call to **LP**'s wife, and stated in pertinent part:

*[Bill: Mr [LP' name redacted] refused to discuss his column on
Knoxville with me when I called earlier this evening.*

** * * * **

*Nigger Says Black On White Racial Crime Should Not Be
Reported
Hatred Against Whites Seeps Out Of Miami Herald*

** * * * **

*Miami, Florida -- A nigger employed by the Miami
Herald has published an editorial justifying the
brutal murders of [victim's name redacted] and [victim's name redacted]
and stating that newspapers should not report black on
white racial crime.*

*[LP's name redacted], a nigger employed by the Herald, said
that those upset about the brutal rape of both white
victims should "Cry me a river ... It always amazes me
when white people put on the victim hat"*

** * * * **

*The bizarre position taken by Nigger [LP's name redacted] is typical
of the mentality fed into the semi-educated blacks,*

and self-hating whites produced by Jewish faculties at major universities. Such loathsome, ignorant creatures predominate in the Jewish owned media.

[LP' name redacted], born [date redacted] is a resident of [address redacted], and lives at [address redacted] with his wife, [name redacted]. You can call him at [telephone number redacted].

His wife gets very upset when you call.

21. On or about June 3, 2007, at or about 11:42 p.m., **WILLIAM A. WHITE** republished the same information quoted in paragraph 20, supra, on *Overthrow.com* and *nsmamerica@yahoogroups.com*.

22. On or about June 6, 2007, when an editor of *The Miami Herald* emailed **WILLIAM A. WHITE** and requested the removal of the posting of personal information about **LP** from *Overthrow.com* and *nsmamerica@yahoogroups.com*, **WILLIAM A. WHITE** responded by email that he would not remove the personal information. **WILLIAM A. WHITE** then posted on *Overthrow.com* a report of his email exchange with the editor, stating in pertinent part:

***Miami Herald And [name redacted] Upset
Demand We Stop Encouraging People To "Harass" Them***

* * * * *

Miami, Florida -- [Bill: Note that I have not encouraged anyone to harass Mr [LP's name redacted]. Just to contact him and share their thoughts and feelings. The email I received today from the Miami Herald and my response follow:]

—[[Editor's name redacted]– Miami [email address redacted] wrote:

- > Mr. Bill White:*
- > Sir, I have to strongly protest the forum posting on*
- > your website – [website redacted]*
- > -- that encourages the harassment of Miami Herald*
- > columnist [LP] and his family. You, your*
- > members or your contributors may disagree with what*

- > *[LP] writes, but it doesn't license harassment.*
- > *This posting also appears on a Yahoo! news group that is affiliated with your organization.*
- > *Please remove the personal information about Mr.*
- > *[LP] from these postings immediately.*
- > *Thank you for your attention in this matter.*
- > *Sincerely:*
- > *Managing Editor/News*
- > *[Editor's name and address redacted]*

* * * * *

Dear Mr [Editor's name redacted]:

*We have no intention of removing Mr [LP's] personal information.
Frankly, if some loony took the info and killed him, I wouldn't shed a tear.
That also goes for your whole news room.*

*Bill White, Commander
American National Socialist Workers Party*

23. On or about October 31, 2007, Dr. **KK**, a professor and administrator at the University of Delaware in Newark, Delaware, administered a university diversity training program which attracted significant Internet blog attention.

24. On or about the morning of October 31, 2007, **WILLIAM A. WHITE** made a telephone call to Dr. **KK**'s telephone at her Newark, Delaware home, spoke with Dr. **KK**'s husband, identified himself as Bill White, the Commander of the American National Socialist Workers Party, and attempted to verify Dr. **KK**'s home address and telephone number.

25. On or about the morning of October 31, 2007, **WILLIAM A. WHITE** made a telephone call to Dr. **KK**'s telephone at her University of Delaware office, in Newark, Delaware, spoke with Dr. **KK**'s secretary, identified himself as Bill White, a leader of a white supremacist

group, insisted on speaking with Dr. **KK**, and told Dr. **KK**'s secretary that he would hunt Dr. **KK** down and that anyone who viewed racism the way she does should be shot.

26. On or about the morning of October 31, 2007, **WILLIAM A. WHITE** posted communications on *nsmamerica@yahoogroups.com* and the *Vanguard News Network Forum* noting the University of Delaware diversity training program, displaying Dr. **KK**'s personal and business addresses and telephone numbers, and displaying her family member's personal address and telephone number. At or about the same time that morning, **WILLIAM A. WHITE** posted the same communication on *Overthrow.com* that added the language "We shot Marxists sixty years ago, we can shoot them again!" and stated in pertinent part:

***UNIVERSITY OF DELAWARE's MARXIST THOUGHT
REFORM***

Read about it here: University Forces All Students To Say That All Whites Are Racist

Office contacts here:

*[Name], President, University of Delaware: [phone number];
[email address]*

*[Name], Director of Residence Life, University of Delaware: [phone number];
[email address]*

Go to their homes here:

*[Full name][date of birth]
President, University of Delaware
Wife [Name] [date of birth]*

** * * * **

*Currently at their vacation home
[street address]
[city, state, zip code]
[phone number] (phone number is confirmed)*

Main Home:

*[street address]
[city, state, zip code]
[phone number] (phone number is confirmed)*

*[KK's name] [date of birth]
Husband [name]
Director of Residence Life
(University Office)
[street address]
[city, state, zip code]
[phone number] (phone number is confirmed)*

*[street address]
[city, state, zip code]
[phone number] (got a home answering machine)*

We shot Marxists sixty years ago, we can shoot them again!

27. In or about February 2008, **RW**, a Canadian lawyer, had for several years advocated against illegal activities of white supremacists in Canada. Previously, in or about 2006, **RW** had participated in efforts to shut down a Canadian-based Internet website that was administered by **WILLIAM A. WHITE**. Thereafter, **WILLIAM A. WHITE** posted **RW**'s home address on the Internet and caused to be mailed to **RW**'s home address a copy of an ANSWP magazine that featured an article referring to **RW**, a picture of **RW**, and **RW**'s home address.

28. On or about February 23, 2008, **WILLIAM A. WHITE** posted an Internet communication on *Vanguard News Network Forum* that republished a media account of the firebombing of a Canadian political candidate's home, solicited someone to do the same to **RW**, and stated in pertinent part:

*ANSWP
COMMANDER*

Good. Now someone do it to RW...

[web link redacted]

*Communist says neo-Nazis torched his Calgary house
Canwest News Service
Saturday, February 23, 2008*

CALGARY -- [victim of firebombing's name redacted] and fiancée [name redacted] believe neo-Nazis were behind a firebomb attack on their house.

[victim of firebombing's name redacted] -- who was home with his four sleeping children on the night of Feb. 12, when the incident occurred -- said he heard a crash, saw fire and called 911.

"It was terrifying to say the least," said the 27-year-old.

The firebomb missed a rear window and torched a fence and patio set.

Both [victims' of firebombing names redacted] are Communists and members of Anti-Racist Action Calgary.

* * * * *

29. On or about February 26, 2008, **WILLIAM A. WHITE** posted an Internet communication on *Overthrow.com* that criticized **RW** under the headline "KILL [RW]," displayed **RW**'s home address, and stated in pertinent part:

Kill [RW]
Man Behind Human Rights Tribunal's Abuses Should Be Executed

Commentary -- [RW], the sometimes Jewish, sometimes not, attorney behind the abuses of Canada's Human Rights Tribunal should be drug out into the street and shot, after appropriate trial by a revolutionary tribunal of Canada's white activists. It won't be hard to do, he can be found, easily, at his home, at [address redacted]

* * * * *

We may no longer have the social cohesion and sense of purpose necessary to fight as a country, but those of us who have the social cohesion and sense of purpose necessary to unify as a race must take notice of an irreconcilable fact: [RW] is an enemy, not just of the white race,

but of all humanity, and he must be killed. Find him at home and let him know you agree:[address redacted].

*Emailed to you by:
Overthrow.com
ATTN: Bill White, Editor*

30. On or about May 5, 2008, **WILLIAM A. WHITE** posted an Internet communication on *Overthrow.com* advocating for RW'S murder which stated in pertinent part:

***Kill [RW]**
May 5th, 2008*

I do everything I can to make sure everyone knows where to find this scum, particularly because it makes him so mad:

***Kill [RW]!**
[address redacted]*

31. On or about March 1, 2008, the national media reported that the Town Council of South Harrison Township, New Jersey, had passed a resolution offering a reward for information leading to the identification of persons responsible for past threats against the township's African American Mayor, **CT**.

32. On or about March 1, 2008, at or about 11 p.m., **WILLIAM A. WHITE** made a telephone call to Mayor **CT**'s telephone at his South Harrison Township, New Jersey home, spoke with **CT**'s wife, identified himself as Bill White, the Commander of the neo-Nazi organization, insisted on speaking to **CT**, and admonished **CT**'s wife that he knew where she lived and that he was going to put a Nazi sign on her front yard.

33. On or about March 1, 2008, at or about 11:34 p.m., the defendant **WILLIAM A. WHITE** transmitted an email communication directed to **CT** which stated in pertinent part:

Dear Mayor [CT's name redacted]:

I recently read of the racism you've faced in Harrisonville [sic], New Jersey, and I wanted to make something perfectly clear:

- a) You are a nigger unworthy to govern over any white man; and,*
- b) Fuck you. You've gotten exactly what you deserve from your constituents.*

Unfortunately, the days when white men would simply burn the local newspaper and run nigger officials out with tar and feathers are past. However, your incidents give me hope that perhaps we shall see them again.

*Bill White, Commander
American National Socialist Workers Party*

ps: We know you live at [address and telephone number redacted]. I just spoke to your wife [name redacted]. I hope you got my message.

34. On or about March 1, 2008, **WILLIAM A. WHITE** republished the email communication described in Paragraph 32, supra, on *nsmamerica@yahoogroups.com* and on the *Vanguard News Network Forum*.

COUNT ONE

1. The Introduction to this Indictment is realleged and incorporated into this Count of the Indictment.
2. That on or about March 22, 2007, in the Western Judicial District of Virginia and elsewhere, the defendant **WILLIAM A. WHITE** knowingly transmitted in interstate commerce a communication by email to **JP**, an employee of Citibank, containing a threat to injure **JP**.
3. All in violation of Title 18, United States Code, Section 875(c).

COUNT TWO

1. The Introduction to this Indictment is realleged and incorporated into this Count of

the Indictment.

2. That on or about March 22, 2007, in the Western District of Virginia and elsewhere, the defendant **WILLIAM A. WHITE**, with the intent to extort a thing of value from a person and corporation, knowingly transmitted in interstate commerce a communication by email to JP, an employee of Citibank, containing a threat to injure JP.

3. All in violation of Title18, United States Code, Section 875(b).

COUNT THREE

1. The Introduction to this Indictment is realleged and incorporated into this Count of the Indictment.

2. That on or about May 23, 2007, in the Western District of Virginia and elsewhere, the defendant **WILLIAM A. WHITE** knowingly attempted to and did use intimidation with the intent to influence, delay and prevent the testimony in an official proceeding of African American tenants, who had asserted claims that their landlord was engaging in discriminatory practices, by mailing letters containing intimidating language to the home addresses of the African American tenants.

3. All in violation of Title18, United States Code, Section 1512(b)(1).

COUNT FOUR

1. The Introduction to this Indictment is realleged and incorporated into this Count of the Indictment.

2. That between on or about June 3, 2007, and on or about June 6, 2007, in the Western

District of Virginia and elsewhere, the defendant **WILLIAM A. WHITE** knowingly transmitted in interstate commerce communications by telephone, email, and Internet postings directed at **LP**, an African American journalist, containing a threat to injure **LP**.

3. All in violation of Title18, United States Code, Section 875(c).

COUNT FIVE

1. The Introduction to this Indictment is realleged and incorporated into this Count of the Indictment.

2. That on or about October 31, 2007, in the Western District of Virginia and elsewhere, the defendant **WILLIAM A. WHITE** knowingly transmitted in interstate commerce communications by telephone and Internet postings directed at Dr. **KK**, a university professor and administrator, containing a threat to injure **KK**.

3. All in violation of Title18, United States Code, Section 875(c).

COUNT SIX

1. The Introduction to this Indictment is realleged and incorporated into this Count of the Indictment.

2. That on or about February 23, 2008, and on or about February 26, 2008, in the Western District of Virginia and elsewhere, the defendant **WILLIAM A. WHITE** knowingly transmitted in interstate commerce communications by Internet postings directed at **RW**, a Canadian lawyer, containing a threat to injure **RW**.

3. All in violation of Title18, United States Code, Section 875(c).

